

BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Sprint Communications)	
Company L.P., Pursuant to Section 252(b))	
of the Telecommunications Act of 1996,)	D.T.E. 00-54
for arbitration of an interconnection)	
agreement between Sprint and Verizon-)	
Massachusetts)	

**SPRINT COMMUNICATIONS COMPANY L.P.'S MOTION TO
STRIKE VERIZON MASSACHUSETTS' AUGUST 10, 2001 SUBMISSION**

Pursuant to 220 CMR 1.04(5), Sprint Communications Company L.P. ("Sprint") respectfully submits this Motion to Strike Verizon Massachusetts' ("Verizon's") August 10, 2001 submission to the Department of Telecommunications and Energy ("Department") proposing revised interconnection agreement language regarding reciprocal compensation. In support of this Motion, Sprint states the following:

1. In an Arbitrator's ruling issued on June 28, 2001 in this proceeding, Sprint and Verizon were directed to jointly file a final interconnection agreement or separately file proposed interconnection agreement language with comments supporting each parties' positions, by July 19, 2001.
2. Sprint and Verizon separately filed submissions in response to the Arbitrator's directive.
3. On August 10, 2001, Verizon filed revised interconnection agreement language, more than three weeks after the July 19, 2001 deadline.

4. Verizon provided no explanation to the Department as to why it did not include this language in its July 19, 2001 filing.
5. Verizon's August 10, 2001 submission mischaracterized Sprint's position, incorrectly stating Sprint's definition of "Telecommunications Traffic".
6. Sprint's proposed interconnection agreement language was timely filed with the Department on July 19, 2001 with supporting comments describing, among other things, its proposed definition of "Telecommunications Traffic".
7. Verizon had every opportunity to present its position on the remaining disputed issues in this case and should have done so within the prescribed timeframe.

WHEREFORE, Sprint respectfully requests that the Department let the record stand as of the July 19, 2001 submissions of both parties and strike Verizon's August 10, 2001 untimely filing.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.

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